

IN THE UNITED STATE'S DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
701 East Broad Street, Suite 3000
Richmond, Virginia 23219-3528



Queen Naja, Trustee
U/T/D 10/23/2019,
Plaintiff,

Vs

KHELIFA N. AHMED Social Security Trust
Defendant
AND

KHELIFA N. AHMED Cestui Que Trust
Defendant

Case no. 3:21-cv-644

Complaint for Civil Action

In Rem Civil Action Case Proceedings- Partial Liquidation of Cestui Que Trust And Social
Secuirty Trust to satisfy injury

Parties

The Defendants, KHELIFA N. AHMED Social Security Trust and KHELIFA N.
AHMED Cestui Que Trust; and

The Plaintiff, Queen Naja, Trustee for Marcel Gershom Ince Trust, U/T/D 10/23/2019
("the Trust"); and

NOW COMES, Queen Naja the Trustee who respectfully moves this Court for a partial
liquidation of the equitable interest in the Social Security Trust and/or Cestui Que Trust Account
in the name KHELIFA N. AHMED, for a distribution of equitable interest of the Cestui Que
Trust as stated on the Certificate of Assignment of Equitable Interest in Trusts (See Attached
copy) to satisfy equitable remedy; and

Jurisdiction

This court has jurisdiction in Rem as it relates to the property of the KHELIFA N. AHMED Social Security Trust of the federal jurisdiction backed by the KHELIFA N. AHMED Cestui Que Trust (the “Trust”).

Claim

On September 25, 2021, around 8:00 a.m., Khelifa N. Ahmed, a driver of a 2012 Chevrolet Cruze, used this car to crash into a parked car in a neighborhood on Briarwood Drive in Laurel Maryland. The car Mr. Ahmed struck was a 2015 Ford belonging to the Marcel Gershom Ince Trust. After Khelifa N. Ahmed hit the park car he proceeded to drive through the neighborhood not realizing there is only one way in and one way out. Mr. Ahmed fled the scene and refuse to stop. While having to drive past the car he hit and witnesses in order to leave the neighborhood Mr. Ahmed’s was witnessed laughing and his license plates were captured by witnesses in the neighborhood. The property damage caused the car struck to be incapacitated prohibiting the Trust beneficiaries from using the car resulting to impeding commerce pursuant to 18 U.S. Code § 1951 - Interference with commerce by threats or violence, and has caused economic hardship to the beneficiaries of the property not having access to transportation; and Mr. Ahmed fled the scene after damaging the property under presumed malice intent and has abandoned his duties and responsibilities to resolve the property damage and has abandoned his estate.

The Plaintiff and beneficiaries of the Trust are not related to and do not know the Defendant. As of October 5, 2021, Mr. Ahmed has failed to return to the accident scene and establish contact with the property owners.

The police were called to the scene on September 25th, 2012 and CPL. Carrington, of the Prince Georges County Police Department created the report (see police report exhibit). On October 2, 2021 the vehicle was towed to an auto body shop to evaluate the extent of the damage and determine if the vehicle is totaled at the cost of the beneficiaries of the Trust.

Question

The question for the Court:

- When someone causes damage to property and flees the scene is this not an abandonment of the perpetrators duties and responsibilities to resolve the matter?
- Has the perpetrator not abandoned his duties and responsibilities?
- In equity proceedings does the Plaintiff have the right to the equity of the abandoned estate of the perpetrators as remedy for damages at the discretion of the Plaintiff?

Prayer for Relief

WHEREFORE Plaintiff, hereby requests this Court enter a Judgement in favor of:

1. U.S. District Court Judge of the United States District Court, Eastern District of Virginia to appoint a Trustee for the Khelifa N. Ahmed Social Security Trust and Khelifa N. Ahmed Cestui Que Trust, with the power of Attorney in Fact to liquidate securities to satisfy the bill on invoice No. 322461 for compensatory damages and punitive damages and ensure the equitable interest is properly transferred to Royal Thrift LLC, a service company for the Marcel Gershom Ince Trust;
2. It is Ordered that this Court accepts for value invoice 322461 (see attached invoice) presented to the Court for satisfaction and **SETTLEMENT**; and
3. The Court may receive "reasonable compensation" plus five percent (5%) of all securities liquidated and for administration of the Trust. Any surplus monies available from the sell of securities may go to the court; and
4. Such other and further relief as this Court may deem just and proper.

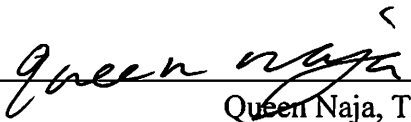
Order for the Court:

This ORDER is hereby given and concurred with the District Court Judge, that the District Court Judge is to have the Trustee to meet with Queen Naja, Trustee for the injured property

and start the Liquidation/Settlement process of these Trust matters within the next 3 days
after receipt acceptance of this Complaint.

I certify, under penalty of perjury under the laws of the United States of America that the
foregoing is true and correct.

Date: October 5, 2021



Queen Naja, Trustee,
Marcel Gershom Ince Trust
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CC'D:
Royal Thrift LLC
c/o Queen Naja, Manager
2159 White Street
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